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November 25, 2015

VIA ECF

Honorable Katherine Polk Failla, U.S.D.J.
United States District Court
Southern District of New York
Thurgood Marshall United States Courthouse
40 Foley Square, Rm 2103
New York, NY 10007

Re: *BWP Media USA Inc., et. ano. v. Gossip Cop Media, LLC.*
Case No. 13-cv-7574-KPF

Dear Judge Failla:

As Your Honor is aware, this office represents the Plaintiffs, BWP Media USA Inc. d/b/a Pacific Coast News ("BWP") and National Photo Group, LLC ("NPG"), in the above referenced action.

I write in connection with the Court's Order of October 29, 2015 (Dkt. 85), to request an enlargement of the time in which Plaintiffs have to depose Defendant's expert. The reason for this request is that Defendant provided only one potential date for the expert deposition, *to wit*, November 30, 2015. We were later advised that the expert is out of the Country and would only be available by telephone on this date. In sum, we were only offered one potential date for a deposition by telephone in the time given by the Court. Upon being so advised, we have been communicating with Defendant's counsel in an effort to agree on an alternate date for an in-person deposition, however, despite efforts on both sides, counsel advised that communication with Professor Leaffer has been sporadic, due to the fact that he is overseas.

As of this afternoon, we have been advised that Professor Leaffer will be out of the Country through the end of December. Consequently, he cannot appear for a deposition until January, however, counsel advised that he does not have exact dates of Professor Leaffer's availability in January at this time. In light of the foregoing, we respectfully request that the deadline to depose Professor Leaffer be extended to January 29, 2016. This request is on consent of Defendant.

If this proposal is acceptable to the Court, I ask that Your Honor "So Order" this letter.

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In closing, the parties thank the Court for its courtesies and attention to this matter.

Respectfully yours,

/s/ Jonathan M. Cader
Jonathan M. Cader

cc: Yuval Marcus, Esq.
Cameron Reuber, Esq.